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8 Counsel for Defendants

9
 10 IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION
 11

12 ELECTRONIC FRONTIER FOUNDATION,)	
)	
13 Plaintiff,)	Case No. 4:09-cv-03351-SBA
)	
14 v.)	Stipulation and Proposed Order
)	
15 CENTRAL INTELLIGENCE AGENCY, <i>et al.</i> ,)	No hearing requested
)	
16 Defendants.)	

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 18 The parties to this action, by and through their undersigned counsel, have
 19 conferred and have reached an agreement with respect to amendments to a proposed
 20 briefing schedule for the filing of motions for summary judgment in this matter. The
 21 amendments are necessary to allow defendant Office of Director of National Intelligence
 22 to complete the processing of documents responsive to plaintiff's FOIA request. The
 23 parties have previously stipulated to a briefing schedule (ECF 57) and to two adjustments
 24 to that briefing schedule (ECF 59, ECF 60) to accommodate the defendants' processing of
 25 responsive records. The parties respectfully request that this schedule be adopted in the
 26 place of the schedules previously proposed.
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 28

1 1. Defendants will file their motion for summary judgment on or before
2 November 22, 2011.

3 2. Plaintiff will file its combined opposition memorandum, and cross-motion for
4 summary judgment, on or before December 20, 2011.

5 3. Defendants will file their combined reply memorandum in support of their
6 motion, and opposition to the cross-motion, on or before January 10, 2012.

7 4. Plaintiff will file its reply memorandum on or before January 24, 2012.

8 5. A hearing with respect to the cross-motions for summary judgment will be
9 scheduled for February 7, 2012, or at a date thereafter that is amenable to the Court.

10 Dated: November 4, 2011

Respectfully submitted,

11
12 /s/ Joel McElvain
JOEL McELVAIN
13 Counsel for Defendants

14 /s/ Jennifer Lynch
JENNIFER LYNCH
15 Counsel for Plaintiff

16
17 I hereby attest that I have obtained the consent for the filing of this document from
18 all persons whose signatures are represented herein.

19 /s/ Joel McElvain
JOEL McELVAIN
20 Counsel for Defendants

21 * * * * *

22
23 PURSUANT TO STIPULATION, IT IS SO ORDERED.

24
25 Dated: _____

26 The Hon. SAUNDRA B. ARMSTRONG
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2011, I electronically filed the foregoing document with the Clerk of the Court, using the CM/ECF system, which will send notification of such filing to the counsel of record in this matter who are registered on the CM/ECF system.

/s/ Joel McElvain
JOEL McELVAIN